

**FILED**

AO 91 (Rev. 11/11) Criminal Complaint

AUG 30 2018

**UNITED STATES DISTRICT COURT**

for the

Southern District of Ohio

Richard W. Nagel  
Clerk of Court, Dayton OH

United States of America

v.

Michael Brown

Case No.

3:18 mj 599

3:18-mj-599

MICHAEL J. NEWMAN

*Defendant(s)***CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of August 30, 2018 in the county of Montgomery in the  
Southern District of Ohio, the defendant(s) violated:*Code Section**Offense Description*21 U.S.C. 841(a)(1) and (b)(1)(B)  
and 846Attempted possession with intent to distribute 500 grams or more of Cocaine,  
a Schedule II controlled substance

This criminal complaint is based on these facts:

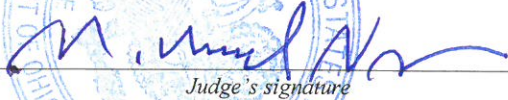
See attached affidavit

☒ Continued on the attached sheet.  
*Complainant's signature*

Brad Dorman, United States Postal Inspector

*Printed name and title*

Sworn to before me and signed in my presence.

Date: 08/30/2018  
*Judge's signature*City and state: Dayton, Ohio

Michael J. Newman, United States Magistrate Judge

*Printed name and title*

**AFFIDAVIT**

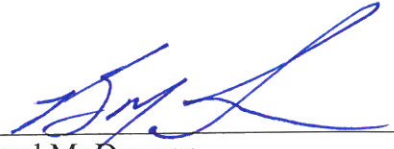
I, Brad Dorman, Postal Inspector, being duly sworn, do hereby depose and state as follows:

1. I am a United States Postal Inspector, having been so employed since August 2017. I am presently assigned to the Cincinnati Field Office, Pittsburgh Division of the Postal Inspection Service with investigative responsibility for southeast Indiana, and southern Ohio. Your Affiant completed United States Postal Inspection Service Basic Training in August 2017. The training involved narcotic investigation techniques, chemical field tests and training in the detection and identification of controlled substances being transported in the United States Mail. In addition to this formal training, your Affiant has worked since August 2017 with various federal, state and local law enforcement agencies in the investigation of the transportation of illegal drugs and their identification.
2. This affidavit is submitted in support of an application for a complaint and arrest warrant for Michael Brown ("BROWN") for a violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(B) and 846, that being "Attempted possession with intent to distribute 500 grams or more of Cocaine, a Schedule II controlled substance."
3. All the details of the investigation are not included in this Affidavit, only information necessary to establish probable cause for the complaint/arrest sought.


**INVESTIGATION**

4. On or about August 30, 2018, I intercepted a Priority Mail Parcel at the Trotwood Post Office in Dayton, Ohio. The parcel is identified as Priority Mail Parcel Label Number 9505513013398240318521 (here after referred to as the "Parcel") addressed to Marcus Jones, **4345 Marlowe Dr, Dayton, OH 45416** with a return address of Margaret Richardson, 15678 Agale Ave, Chino, CA 91708. The parcel is being sent from the Los Angeles, California area, a known drug source location.
5. Per postal records, 4345 Marlowe Drive is non-existent, but there is a 4345 Marlowe Street in that zip code and to where mail addressed in this manner would be delivered. On August 30, 2018, I queried **4345 Marlowe Dr, Dayton, OH 45416**, the address listed on the Parcel, in the Consolidated Lead Evaluation and Reporting (CLEAR) database system. CLEAR is a public record data investigative platform available exclusively to law enforcement and other government investigators about people and businesses. CLEAR indicated that Marcus Jones is not associated with either 4345 Marlowe Drive or 4345 Marlowe Street in Dayton, 45416.
6. On August 30, 2018, I obtained a federal search warrant which I then executed on the Parcel. Upon opening the Parcel, I removed a plastic lego box. Inside the lego box were Duplo legos wrapped in plastic bags along with a plastic wrapped block. The plastic wrapped block weighed approximately 2 pounds 10 ounces and contained a white powdery substance that field tested positive for Cocaine. Based on my training and experience, I am aware that the quantity of cocaine seized exceeds what would be possessed for personal use and instead is consistent with that possessed for distribution.

7. On August 30, 2018, an undercover law enforcement officer posing as a United States Postal Service employee delivered the Parcel with sham cocaine to 4345 Marlowe Street, Dayton, OH 45416. Prior to the delivery, investigators conducted surveillance of 4345 Marlowe Street, and observed a male (later identified as BROWN) sitting in a vehicle in the street in front of the residence. He was already parked there when investigators arrived. The Parcel was delivered to another male at the door, and then took into the home. A few moments later, BROWN exited his vehicle and met the male who exited the home in the front yard. The second male provided BROWN with the package, and Brown took back to his vehicle. At that point, investigators detained BROWN and seized the Parcel. BROWN was interviewed by investigators, and provided a statement. Among his statements, BROWN stated (in summary) that he knew the package contained drugs and that he was picking it up for a third party. BROWN later consented to a search of his phone, and in a text message on the phone was the Parcel's tracking number.
8. Based on the above facts, Affiant submits that there is probable cause to believe that BROWN attempted to possess with intent to distribute more than 500 grams of Cocaine, a Schedule II controlled substance, in violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(B) and 846.

  
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Brad M. Dorman  
Postal Inspector

SUBSCRIBED and SWORN before me this 30th day of August, 2018

  
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HONORABLE MICHAEL J. NEWMAN  
UNITED STATES MAGISTRATE JUDGE

